

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**BRYCE BROWN,**

**Plaintiff,**

**V.**

CHANDRESH PATEL, ET AL.

**Defendant,**

**G&A OUTSOURCING III LLC., DBA  
ONPOINT LAB, ET AL.**

**Defendant.**

[illegible]

**CIVIL ACTION NO. 4:24-cv-05036**

## JURY TRIAL DEMANDED

**DECLARATION OF DANIEL COOLIDGE IN SUPPORT OF DEFENDANTS G&A  
OUTSOURCING III, LLC, ONPOINT LAB L.L.C., AND CHANDRESH PATEL’S  
MOTION TO COMPEL ARBITRATION**

I, Daniel Coolidge, declare as follows:

1. I am an attorney admitted to practice in the Southern District of Texas and the courts of the State of Texas. I am an attorney in the law firm of Littler Mendelson, P.C. and counsel of record for G&A Outsourcing III, LLC, OnPoint Lab L.L.C., and Chandresh Patel (“Defendants”) in this matter.

2. I have personal knowledge of the facts set forth herein.

3. On January 30, 2025, I sent an email correspondence to pro se Plaintiff Bryce Brown enclosing the Arbitration Agreement and Plaintiff's electronic acknowledgment and signature dated August 14, 2023. A true and correct copy of my e-mail is attached hereto as **Exhibit A-1.**

4. Later that day on January 30, 2025, I spoke on the phone with Plaintiff, seeking a response as to whether Plaintiff would acknowledge his obligation to arbitrate this matter. Plaintiff indicated to me specifically that he refused to stay his lawsuit and proceed to arbitration.

5. On February 17, 2025, I spoke on the phone and sent an email correspondence to Plaintiff, confirming whether he would agree to stay his lawsuit pending arbitration. Plaintiff acknowledged that while he is willing to arbitrate, he would not move to stay his lawsuit. I followed up again on February 19, 2025, but Plaintiff still refused to stay his lawsuit. A true and correct copy my e-mail is attached hereto as **Exhibit A-1**.

6. Attached hereto as **Exhibit A-2** is a true and correct copy of excerpts from the American Arbitration Association's Employment Arbitration Rules and Mediation Procedures dated November 1, 2009, accessed via AAA's website at [https://www.adr.org/sites/default/files/EmploymentRules\\_Web\\_2.pdf](https://www.adr.org/sites/default/files/EmploymentRules_Web_2.pdf).

I declare under penalty of perjury that the foregoing is true and correct.

Signed and dated February 24, 2025.

*Daniel Coolidge*  
Declarant